1	SADOW LAW FIRM
1	David J. Rothenberg (NV 13576)
2	5588 S. Fort Apache Rd., Suite 130
_	Las Vegas, NV 89148
3	Tel: (702) 249-0160
	Email: david@sadow.law
4	Attorney for Mexican Gold &
	Oil Exploration Trust
5	UNITED S

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

CANDY TORRES,

No. 2:19-CV-00594-APG-EJY

8

Plaintiff

VS.

ALLAN ROTHSTEIN,

Defendants.

STIPULATION AND ORDER FOR CONTINUANCE OF DEADLINE FOR OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO AMEND

Stipulation and Order for Continuance

Plaintiff Candy Torres, Defendants Allan Rothstein, and Drake Rothstein as Trustee of The Mexican Gold & Oil Exploration Trust dated November 7, 2012 (the "Trust") by and through their respective counsel, hereby stipulate and agree as follows:

- 1. The deadline to oppose Plaintiff's Motion for Leave to Amend, currently set for April 12, 2024, shall be continued for four (4) days, until April 16, 2024.
- Good cause exists for the continuance. Plaintiff and the Trust have reached a settlement in principle that would avoid the need for further briefing on the Motion. The settlement agreement has been drafted and is being circulated.
- 3. The parties agree that the ends of justice are served by granting this continuance to allow for a more efficient resolution without judicial resources.

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	1	4. This is the fifth stipulation for continuance filed in this matter for this hearing		
Sadow LAW FIRM 5588 S. Fort Apache Rd. Suite 130 Las Vegas, NV 89148 (702) 249-0160	2			
	3	DATED this 12th day of April 2024.	DATED this 12th day of April 2024.	
	4	/s/ David Rothenberg	_/s/ Liza Cristol-Deman	
	5	David J. Rothenberg (NV 13576) SADOW LAW FIRM	Christopher Brancart (NV 8969) Liza Cristol-Deman, <i>Pro Hac Vice</i>	
	6	5588 S. Fort Apache Rd., Suite 130 Las Vegas, NV 89148 Tel: (702) 249-0160 Email: david@sadow.law Attorneys for Mexican Gold & Oil Exploration Trust	(CA 190516) BRANCART & BRANCART Post Office Box 686 Pescadero, CA 94060 cbrancart@brancart.com lcristoldeman@brancart.com	
	7			
	8			
	9			
	10		Attorneys for Plaintiff	
	11	DATED this 12th day of April 2024.	Kristopher Pre (NV 14106) NEVADA LEGAL SERVICES 530 South 6th Street	
	12			
	13		Las Vegas, NV 89101	
	14	<u>/s/ Michael L. Becker</u> Michael L. Becker	kpre@nevadalegalservices.org Attorneys for Plaintiff	
	15	Adam M. Solinger		
	16	LAS VEGAS DEFENSE GROUP, LLC 2970 W. Sahara Avenue		
	17	Las Vegas, NV 89102 clients@702defense.com		
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ORDER

The Parties at issue having stipulated to and for good cause shown:

IT IS HEREBY ORDERED that the deadline for opposition to Plaintiff's Motion for Leave to Amend is continued from April 12, 2024 to April 16, 2024.

IT IS SO ORDERED.

DATED: April 15, 2024

United States District Judge